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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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JUN 20 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

REVISION OF PART 22 OF THE
COMMISSION'S RULES GOVERNING THE
PUBLIC MOBILE SERVICES

CC Docket No. 92-115

To: The Commission

COMMENTS OF AIRTOUCH PAGING

AIRTOUCH PAGING

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SUMMARY

AirTouch Paging is commenting on the Further Notice of Proposed Rulemaking in the Part 22 Rewrite proceeding.

AirTouch supports most of the Commission's proposals including the general use of competitive bidding to resolve mutually exclusive (MX) application conflicts and the adoption of a shortened (30-day) MX window.

However, AirTouch does not believe the Commission should abandon the block allocation plan that now applies to 931 MHz paging frequencies. Generally, this channel assignment plan has worked well. It could be improved by incorporating a "market area licensing" approach based upon state boundaries.

In areas where 931 MHz frequencies are scarce, the current backlog in licensing could be solved by making minor adjustments in the rolling 60-day MX window procedure, and using competitive bidding to issue licenses.

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AirTouch Paging,^{1/} by its attorneys, hereby respectfully submits its Comments on the Commission's Further Notice of Proposed Rulemaking, released May 20, 1994 ("NPRM"),^{2/} which proposes, *inter alia*, to alter its processing rules for 931-932 MHz common carrier paging licenses. The following is respectfully shown:

I. BACKGROUND

1. AirTouch Paging is one of the largest providers of commercial mobile radio paging services in the United States with

^{1/} In connection with the spin-off of the wireless businesses of Pacific Telesis Group, PacTel Corporation has become AirTouch Communications and PacTel Paging has become AirTouch Paging, effective April 1, 1994.

^{2/} FCC 94-102.

over 1.2 million units in service.^{3/} AirTouch Paging operates numerous common carrier paging systems licensed under Part 22 of the Commission's Rules, and has been an active participant in the rulemaking proceedings to revise Part 22 of the Commission's Rules.^{4/} Based upon its operating history and its active participation in related rulemaking proceedings, AirTouch Paging has substantial experience to draw upon in commenting on the proposed rules embodied in the NPRM.

2. AirTouch Paging applauds the Commission's goals in this NPRM to eliminate unnecessary information collection requirements, streamline licensing procedures, and reduce the processing and review burden on the Commission staff.^{5/} As outlined below in greater detail, AirTouch Paging supports most of the Commission's proposals, but believes that the Commission's proposal to abandon the current block allocation processing rules for 931-932 MHz paging channels does not serve these goals or the public interest. In addition, AirTouch Paging urges the Commission to take this opportunity to change from a transmitter based licensing approach to market area licensing in this frequency band.

^{3/} AirTouch Paging comments solely on the aspects of this NPRM affecting the 931-932 MHz paging rules. AirTouch's parent, AirTouch Communications, will file separate comments addressing the aspects of the NPRM relating to changes in the cellular rules.

^{4/} See Part 22 Rewrite, CC Docket No. 92-115. See also Amendment of Part 22 of the Commission's Rules Pertaining to Power Limits for Paging Stations Operating in the 931 MHz Band in the Public Land Mobile Service, CC Docket 93-116.

^{5/} NPRM at ¶1.

**II. THE COMMISSION SHOULD NOT ABANDON
BLOCK ALLOCATIONS BUT RATHER ADOPT MARKET AREA LICENSING**

3. In the NPRM, the Commission proposes to abandon its current block allocation processing rules for 931-932 MHz paging channels and in its place adopt channel-specific license processing rules.^{6/} The Commission concludes that this proposed rule change serves the public interest because it will lead to more efficient processing of license applications and less confusion and delay.^{7/} AirTouch Paging disagrees.

**A. Abandoning Block Allocations
Will Not Serve The Public Interest**

4. The Commission's current block allocation rules have served the Commission well and should not be changed now. Before the block allocation rules were initially adopted, the Commission was constantly bombarded with applicants filing mutually exclusive applications for VHF and UHF paging channels. Based upon that history, the Commission adopted the block allocation scheme to eliminate the problems it perceived with the channel-specific rules for VHF and UHF paging channels.

5. The Commission's solution to the problems with VHF and UHF paging worked. The Commission has virtually eliminated strike applications for 931-932 MHz paging channels as a direct result of the Commission having the authority to resolve potential mutual exclusivity situations by assigning each

^{6/} NPRM at ¶16.

^{7/} NPRM at ¶12.

licensee a different frequency. These processing rules can continue to be successful to limit mutually exclusive applications.^{8/}

6. The Commission's proposal to abandon block allocations will not serve the public interest because it will lead inevitably to strike and speculative applications. Under the current block allocation processing rules, strike and speculative applications are deterred because an applicant cannot be assured of obtaining a specific frequency. The ability to obtain a specific frequency is the linchpin of the ability to successfully file a strike application. If the Commission adopts its proposal, it should expect a resurgence of the filing of strike applications.^{9/}

7. In addition, AirTouch Paging disagrees that abandoning the block allocation processing rules will reap the benefits the Commission perceives. The Commission supports this proposal by observing that there is now a "backlog" of approximately 700 pending applications for 931 MHz licenses.^{10/} AirTouch Paging, however, does not believe the Commission's

^{8/} Indeed, the Commission in the Part 22 Rewrite wanted to eliminate the possibility of mutually exclusive applications by adopting first-come, first-served processing rules. It is ironic that now the Commission has come full circle and wants to extend the current mutual exclusivity morass of VHF and UHF channels to 931 MHz to ensure additional chances for mutual exclusivity.

^{9/} This is especially true since the top 10 markets are now experiencing frequency shortages.

^{10/} NPRM at n. 33.

proposal will materially improve the backlog.^{11/} In markets where there are more applications than licenses available, the Commission's proposal merely assures that it will have to hold either lotteries or auctions for the channels available at this time.^{12/} Indeed, the Commission's approach may increase the number of pending applications because it proposes to reopen the filing window for all previously filed applications in congested markets.^{13/} Increasing the number of pending applications obviously would not serve the public interest.

8. In addition, the Budget Act^{14/} encourages the Commission to continue to use methods available to it to minimize those situations where applications are subject to mutually

^{11/} It is unclear how many of these backlogged pending applications are the result of the current block allocation scheme and how many are the pure result of the tremendous growth of the paging industry, which grew over 25% on average last year. Since paging licenses are awarded on a per transmitter basis, the expansion or creation of a new system will result in hundreds of new applications. For instance, AirTouch Paging's Southern California system consists of over 70 transmitters, many of which were the subject of separate applications. To eliminate the substantial number of applications, the Commission must adopt a different geographic licensing scheme -- such as area licensing. See infra at ¶¶12-18.

^{12/} In fact, in some markets, such as the New York area, the logjam was created by an ambiguity in the Commission's Rules. Under the rules, it is unclear when a channel becomes available for reassignment. For instance, if a channel becomes available after there have been more applications than frequencies, it is unclear whether that new channel may be used to either eliminate the frequency shortage, or whether it will be the subject of a further filing window.

^{13/} NPRM at ¶17.

^{14/} Omnibus Budget Reconciliation Act of 1993, P.L. 103-66 (1993) ("Budget Act").

exclusive applications.^{15/} The Commission's proposal, however, does not serve this goal. The approach set forth in the NPRM will increase the probability and number of mutually exclusive applications.^{16/} This will not serve the public interest.

9. Furthermore, although the Commission may face some difficulties in frequency congested markets, most areas do not suffer from frequency scarcity. The Commission should not design solutions to solve five percent or less of the geographic licensing area problems by changing the rules for the remaining ninety-five percent of the licensing areas. The current rules have served the Commission and the public well, so the Commission should not abandon its current block allocation scheme.^{17/} Instead, the Commission should adopt specific changes to its Rules to eliminate the problems in those frequency scarce markets.^{18/}

^{15/} 47 U.S.C. 309(j)(6)(E) (1994).

^{16/} As the Commission's experience with VHF and UHF channels illustrates, specific frequency allocation schemes beget mutually exclusive applications.

^{17/} If the Commission believes that manpower is a problem, it could begin coordinating 931 MHz applications like 929 MHz applications. Indeed, such a result may be mandated by the Budget Act.

^{18/} In fact, the Commission's proposal could lead to further anomalies regarding frequency congested markets where one channel may have a significant number of applicants (such as strike applicants trying to deter new entrants) and another channel being licensed at the same time would have only one new licensee. Such a result cannot serve the public interest.

**B. To Solve The Problems Faced By The Commission
In Frequency Congested Markets The Commission Should
Adopt Some Minor Rule Clarifications**

10. To address the problems the Commission faces in certain frequency scarce markets, the Commission should adopt two minor rule changes instead of the proposal in the NPRM. First, the Commission should make clear that it will include in the allocation pool all channels that are available at the time the licenses are granted, and not simply those that were available when the mutually exclusive applications were filed.^{19/} Second, the Commission should place all applications that fall within a filing window into the bidding pool along with all frequencies available at the time the auction is held.^{20/} The FCC would then conduct a simultaneous multiple round auction in which applicants would be permitted to bid on any of the channels available at that time.

11. These rule changes serve the public interest for three reasons. First, in markets where there is an abundance of channels available, strike applicants cannot create artificial competitive bidding situations. It clearly does not serve the public interest to incent strike or speculative applicants to file for frequency. Second, it makes no sense to withhold

^{19/} AirTouch Paging understands that this may actually be a substantial part of the problem in congested markets. The Commission's view of the current rules is that channels become available for application only after the authorization is terminated by Public Notice.

^{20/} This rule change would allow for the greatest number of channels to be auctioned at the same time. This rule change would also permit the marketplace to determine the value of the frequencies, and would potentially shorten the time period in which a terminated license remains fallow.

frequencies from applicants merely because they filed their application after a frequency was automatically terminated by operation of the Commission's Rules, but before the Commission issued a Public Notice taking the frequency back.^{21/} Third, in frequency scarce markets, the Commission would be able to fairly auction the spectrum among all applicants just like the Commission is currently scheduled to auction Narrowband PCS spectrum.^{22/}

**C. AirTouch Proposes That The Commission
Adopt Market Area Licensing**

12. AirTouch Paging has several additional recommendations for the Commission that will serve the public interest by eliminating unnecessary information collection requirements, streamlining licensing procedures, and reducing the processing and review burden on Commission staff. First, AirTouch Paging recommends that the Commission change its current transmitter-by-transmitter licensing rules for 931-932 MHz paging channels to a market area license. Second, AirTouch Paging

^{21/} Indeed, this is exactly the situation that the Commission faced in Southern California where the licensee failed to renew its license, but the Commission perceived that it was stymied by the fact that it had not issued a Public Notice taking the frequency back.

^{22/} The Narrowband PCS auction is very illustrative of how the public interest can be served by an auction where all applicants have an opportunity to bid on all channels that are available, thus allowing the market, and not filing gamesmanship, to select the applicant who most highly values the spectrum. As the Commission has found in the context of Narrowband PCS, auctions that are open to all qualified bidders in a pool format allows the greatest opportunity for the applicant who most highly values the spectrum to win the license.

recommends that the Commission eliminate the requirement to file sites that are internal to the aggregate geographic service area ("AGSA") of the licensee in the market.^{23/} Adoption of both of these proposals will serve the public interest and the goals outlined by the Commission in this NPRM. AirTouch Paging will discuss each proposal separately.

13. AirTouch Paging recommends that the Commission abandon its current transmitter specific licensing rules in favor of market area licensing on a statewide basis. Under this proposed rule change, the Commission would issue a license for an entire state to a licensee that has facilities serving the state.^{24/} Within sixty days of adoption of the final rules, each existing licensee would be required to submit, certifying under penalty of perjury, a list of all of its 931 MHz licenses listing the states served by the licensee and a current map depicting the AGSA of the licensee.^{25/} If more than one existing licensee serves a state, each co-channel licensee in the state would be granted a statewide market area subject to each co-channel

^{23/} This proposal is virtually identical to the one advanced by the Commission in the NPRM for cellular. See ¶¶7-9.

^{24/} A licensee would be considered to be serving the state if either (i) it has transmitters located inside the state, or (ii) the service area of transmitters outside the state extend into the state. This would ensure that in those instances where a city transverse a state boundary, the licensee would be licensed for both states in which it provides coverage today.

^{25/} The required map would be on a scale of 1:500,000 (similar to the proposed map scale for cellular) and would only contain the exterior sites. See ¶¶6, 10. AirTouch Paging believes that a scale of 1:500,000 for 931 MHz paging would be adequate for the purpose of determining the AGSA of a licensee. See id.

licensee protecting the facilities of the other existing co-channel licensees.^{26/} For all new applications, applicants would be required to list the state to be licensed and submit a map of the AGSA for the facility.^{27/} As a licensee expands its AGSA, the licensee would be required to file a Form 401 application specifically depicting the increase in the AGSA, and the Commission would place that application on Public Notice.

14. State boundaries, rather than other market definitions, such as Major Trading Areas, Basic Trading Areas, Regions, or Metropolitan Statistical Areas are appropriate. In selecting the size of the market area, the Commission will be forced to choose between two important considerations. First, the market size must be sufficiently small to ensure that most market area licenses are held by only one licensee.^{28/} Second, the market size must be sufficiently large to allow meaningful construction of systems within the market area.^{29/}

15. AirTouch Paging believes that statewide market areas strike the appropriate balance between these two considerations. For instance, regional market areas fashioned on the Narrowband PCS regions would be the most logical licensing area for paging, but it could lead to many situations in which

^{26/} All current arrangements would naturally be grandfathered.

^{27/} This map would also be on a scale of 1:500,000.

^{28/} This outcome is beneficial because it leads to a more efficient licensing process and reduces the demand on the scarce Commission resources.

^{29/} This concern was expressed by several commenters regarding BTAs and MTAs with respect to the Narrowband PCS licensing areas.

licenses are shared among two or more licensees. In addition, AirTouch Paging does not believe that licensees can be allowed to design their own market area licenses for 931 MHz paging because this would pose enormous problems for the Commission in sorting out who has which state included in its region.^{30/} AirTouch Paging believes that the most realistic licensing area for 931 MHz paging is on a statewide basis.

16. In addition, AirTouch Paging proposes that the Commission forego requiring applications for sites which are internal to the AGSA and that do not expand the AGSA.^{31/} The Commission has proposed such a change for cellular licensees, and AirTouch Paging believes that the same public interest benefits that will accrue from its use in cellular will also accrue from its use in the 931 MHz paging. In proposing its use for cellular licenses, the Commission found several public interest benefits from this kind of rule change: (1) the Commission staff would not need to maintain records of all internal sites, and (2) the elimination of internal sites would assist the Commission in automating the processing of applications.^{32/} In changing to an AGSA approach, the Commission should also adopt the technical calculations for interference and service areas contained in CC

^{30/} This is in juxtaposition to 929 MHz paging where the spectrum was relatively free from licensees, thus permitting licensees to choose their market area license for regional licenses.

^{31/} Under the current Commission Rules, these are the so-called "100% fill in transmitters". AirTouch Paging believes that a substantial portion of the Commission's work involves applications of this type.

^{32/} NPRM at ¶8.

Docket No. 93-116 (Power Limits for 931 MHz Paging Stations).^{33/}
This change would permit licensees to fully serve the entire market, not just that portion more than twenty miles from the border.

17. In cases where more than one party is licensed for a state, each licensee would be required to protect the other co-channel licensee in the state as it does today. If a licensee filed an application to expand its AGSA and the state contains more than one licensee, the application would be placed on Public Notice subject to a thirty-day filing window for the other co-channel licensees in the state. This would ensure that both licensees would have an adequate opportunity to serve all parts of the state. In those instances where there is no licensee for a market, applications for that market would be subject to the thirty-day filing window and the current block allocation licensing processing rules.^{34/}

18. AirTouch Paging believes that these proposals will further the public interest by making the licensing process more efficient, because fewer applications would be filed with the Commission. Currently, to construct a Southern California system, a licensee may file 70 or more license applications with the Commission. Under the proposed process, an applicant would only file one application outlining perimeter sites. This reduction in applications will relieve the Commission staff of an

^{33/} See note 4, supra.

^{34/} If the Commission ultimately adopts coordination of new license applications, the coordinator can perform all of these functions for the Commission.

enormous amount of paperwork. As a result of the reduction in applications, the Commission will be able to grant licenses more quickly, thereby serving the public interest.

III. AIRTOUCH PAGING SUPPORTS A SHORTENED FILING WINDOW

19. The Commission proposes to shorten the current sixty-day filing window for 931-932 MHz paging applications to a thirty-day filing window.^{35/} AirTouch Paging supports such a revision. The current sixty-day window was adopted when the channels were originally allocated back in 1982. This long rolling filing window may have made sense when the methods of communications were substantially slower. However, today, most licensees and their counsel have the Public Notice within twenty-four hours of release. AirTouch Paging believes that most applicants become aware of an application in plenty of time to file a competing application within thirty days. This is particularly true since application preparation is becoming increasingly automated.

20. The sixty-day filing window also impedes the licensing process by imposing unnecessary delay.^{36/} Accordingly,

^{35/} NPRM at ¶16.

^{36/} AirTouch Paging opposes reducing the filing window below thirty days or switching to a first-come, first-served licensing process for 931 MHz paging channels because AirTouch Paging does not believe that such shorter filing windows serve the public interest. AirTouch Paging believes that the thirty-day filing window appropriately balances the efficient processing of licenses with the need for existing licensees to have an opportunity to file competing applications.

the Commission should shorten the filing window to thirty days from release of the Public Notice.

**IV. THE COMMISSION SHOULD ADOPT ITS PROPOSAL
TO USE COMPETITIVE BIDDING FOR PENDING APPLICATIONS**

21. In the NPRM, the Commission proposes to utilize competitive bidding to select among applications that are pending when the final rules become effective.^{37/} AirTouch Paging supports the Commission's proposal. AirTouch Paging believes that the public interest will be served if currently pending applications are able to be processed expeditiously and in a uniform manner. If the Commission adopted a two-tier approach -- all applications pending, but which are filed before July 26, 1993 are handled by lottery and the rest by auction -- the Commission may create confusion and may experience further delay of licensing the spectrum. This is particularly true considering that the Commission currently has acute problems with frozen applications in a number of states because the number of applications exceed the number of channels available.^{38/} If the Commission adopts this proposal for all frequencies, then it would not need to place all currently pending applications back

^{37/} NPRM at ¶17.

^{38/} The unique circumstance presented by 900 MHz licensing justifies the use of auctions for all pending applications. In other less complicated circumstances (e.g., air-ground), the Commission should accept the July 26, 1993 cut-off as a bright line date, and continue old processing procedures for applications filed before that date.

on Public Notice to get them outside the grandfather portion of the Budget Act.^{39/}

**V. THE COMMISSION SHOULD ADOPT ITS DEFINITION OF
A LICENSE MODIFICATION**

22. In the NPRM, the Commission proposes to change the definition of modification applications for 931 MHz paging applications.^{40/} Under the current Commission Rules a modification of a perimeter 931 MHz facility requires an application for a new license. The current rule is considerably different than the rules for other paging channels, such as VHF and UHF channels. In licensing a VHF or UHF channel, a licensee can move the facility so long as it modifies the station parameters to limit any extension of the facility's service area. Since 931 MHz paging stations are licensed on a 20-mile circle basis, any relocation of the site, no matter how minor, requires a new application.^{41/} The public interest is not served by the current rule because it creates needless paperwork and consumes

^{39/} By requiring all pending applicants to refile their applications, the Commission is effectively requiring all of these applications to be awarded via competitive bidding, instead of lottery. If the Commission's goal is to make all of these pending applications be awarded via competitive bidding, in the instance of 931 MHz paging licenses it makes no sense to change all the rules (e.g., abandon the block allocation rules) to achieve this result. The Commission should merely find that these applications must be awarded via competitive bidding.

^{40/} NPRM at ¶18.

^{41/} As discussed more fully infra at ¶16, the Commission should also adopt new power curves in accordance with the Narrowband PCS Rules. See Section 24.103(e). These Rules would allow licensees to move facilities without requiring new applications so long as the facility is designed to eliminate any extensions of the service area.

scarce Commission resources. The Commission's proposal would allow some flexibility to licensees so that they could relocate the facility if they lost a lease without being subject to the initial application procedures.^{42/} Accordingly, the Commission should adopt this proposal.

**VI. THE COMMISSION SHOULD ADOPT ITS PROPOSAL
TO USE FIRST-COME, FIRST-SERVED PROCESSING RULES FOR
LICENSE MODIFICATIONS**

23. In the NPRM, the Commission proposes to use first-come, first-served procedures to process 931 MHz paging license modifications where the Commission concludes that the use of competitive bidding would not be legally permissible.^{43/} AirTouch Paging agrees with the Commission that first-come, first-served processing rules serve the public interest when used for license modification applications. AirTouch Paging believes that such a rule will ensure prompt and efficient processing of license modification applications which, for the most part, will not be subject to mutually exclusive applications and have little impact on adjacent co-channel licensees. In order to provide adjacent co-channel licensees information on these facilities, however, AirTouch Paging recommends that the Commission place the grant of any such modifications that increase the service area of the licensee on Public Notice.

^{42/} This change alone could conserve the Commission's scarce resources by eliminating applications that do not have any material impact on adjacent licensees.

^{43/} NPRM at ¶18.

VII. CONCLUSION

24. The foregoing premises having been duly considered, AirTouch Paging respectfully requests that the Commission (i) forego abandoning its block allocation processing rules for 931-932 MHz paging channels, and (ii) adopt the proposals set forth above by AirTouch Paging.

Respectfully submitted,
AirTouch Paging

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CERTIFICATE OF SERVICE

I, Tana Christine Maples, hereby certify that I have this 20th day of June, 1994, caused copies of the foregoing Comments of AirTouch Paging to be delivered by hand, courier charges prepaid, to the following:

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